



455 Golden Gate Ave., 10th Floor
San Francisco, CA 94102
Phone (415) 403-4920
FAX (415) 703-5477

STATE OF CALIFORNIA
DEPARTMENT OF INDUSTRIAL
RELATIONS
DIVISION OF APPRENTICESHIP
STANDARDS
AUDIT REPORT

For

International Association of Bridge,
Structural and Ornamental and Reinforcing
Iron Workers Local 433 Joint
Apprenticeship Training Committee,
File No. 00667

The Division of Apprenticeship Standards creates opportunities for Californians to gain employable lifetime skills and provides employers with a highly skilled and experienced workforce while strengthening California's economy.

CONTENTS

Summary.....3

Findings and Recommendations.....3

Audit Highlights/Introduction/Background.....4

Scope/Focus/Methodology.....6

Audit Results and Recommendations.....7

Comments from Program Sponsor.....16

Corrections and Timeline.....16

Remarks.....16

SUMMARY

The Division of Apprenticeship Standards (DAS) presents its audit report concerning The International Association of Bridge, Structural and Ornamental and Reinforcing Iron Workers 433 Joint Apprenticeship Training Committee (JATC) program; DAS file number 00667, (hereafter "program"). The program's standards were approved on October 1, 1996, and completely revised on May 24, 2005. The program has submitted several revisions to its approved standards, the most recent being approved on December 17, 2008. The program was randomly selected by DAS for audit compliance. The audit was performed from January 7, 2009, through January 13, 2009, and was conducted pursuant to California Labor Code §3073.1.

As noted in the detailed report which follows, the auditor found that the program is doing an excellent job of training apprentices and keeping them on schedule. The program is in compliance with their approved standards and legal requirements.

FINDINGS AND RECOMMENDATIONS

Program is doing an excellent job of training apprentices and keeping them on schedule with wage increases and Related Supplemental Instruction (RSI). The training coordinator, instructors, and facility clerical staff keep accurate records on class attendance and completion of RSI. Accurate records are in place to notify employers of apprentice upgrades and rate increases. The program documents and verifies apprentice's on-the-job training (OJT) hours and reconciles apprentices OJT hours with program's approved work processes.

Detailed findings and recommendations are included in this report. The coordinator was presented with a summary of the findings and a recommendation was presented to assist him in preparing the appropriate corrective action. If appropriate the DAS will visit the program in the future to verify compliance with the recommendations. These DAS audit procedures allow the program to respond to the recommendations and their response will become part of this formal report.

During the audit examination Training Coordinator, Paul E Martinez, commented that he and his staff are committed to the success and improvement of the program and welcomed any recommendations and/or suggestions that would help the program achieve its goal of graduating skilled journeymen. He also stated that The International Association of Bridge, Structural and Ornamental and Reinforcing Iron Workers 433 Joint Apprenticeship Training Committee (JATC) is committed to helping apprentices reach their goal of becoming skilled journeymen and working safely in the trade.

INTRODUCTION/BACKGROUND

AUDIT HIGHLIGHTS.....

Our review of The International Association of Bridge, Structural and Ornamental and Reinforcing Iron Workers 433 Joint Apprenticeship Training Committee (JATC) program; Division of Apprenticeship Standards (DAS) file number 00667, (hereafter "program") found that:

- Audit review found that the program has submitted several revisions to its approved standards, the most recent being approved December 17, 2008. On May 24, 2005, the DAS approved program's complete revision of its standards.
- The program requires all apprentices to sign and confirm that they understand the program's Rules and Regulations. All of the apprentice files examined contained signed copies of the rules and regulations receipt.
- The program files contained consistent verifiable OJT work hours and contained a verifiable tally of the various work processes.
- The apprentice is required to complete an Apprentice Quarterly Work and Training Record (program's version of DAS Form 103) to track work processes and OJT work hours.
- Files examined contained copies of Apprentice Quarterly Work and Training Record signed by the apprentice and by the foreman and/or supervisor.

The audit began on January 7, 2009, and was completed on January 13, 2009. The auditor met with key administrative personnel, examined records, observed administrative activities, conducted a walk-through of the training facility, observed a classroom session, and visited two job sites in connection with the audit.

The International Association of Bridge, Structural and Ornamental and Reinforcing Iron Workers 433 Joint Apprenticeship Training Committee (JATC) program operates as a Labor/Management Cooperative and the principal partners in the cooperative effort are Steel Fabrication Association of Southern California, and Ironworkers Local Union No. 433 International Association of Bridge, Structural, Ornamental, and Reinforcing Ironworkers. The program has an Apprentice Trust Fund. The program's funding mechanism comes from employer contributions, related supplemental Instructional (RSI) funds (Montoya Funds) and state prevailing wage training fund contributions.

The daily operations, management and administrative functions are run by three primary staff, Paul Martinez, Training Coordinator, Yvonne Garcia, Office Manager, and Dick Zampa Jr. Training Director. The program employs 3 full time certified instructors and uses retired, qualified ironworkers as substitute instructors as needed. The program office is located at 5555 Fresca Drive La Palma CA 90623. The La Palma training facility also serves as the program's main office and daily place of business. The program maintains all indentured apprentice files at that location. The program employs three full time clerical staff workers to maintain the apprentice files.

The International Association of Bridge, Structural and Ornamental and Reinforcing Iron Workers is a 48-month program. Apprentices meeting the required advancement criteria progress through 8 upgrade steps until completion. Training consists of 664 hours of RSI and 5600 hours of accumulated on- the- job training (OJT).

Employers are approved to train when they have completed an Agreement to Train Apprentices, DAS-7 form. The program indicated that they dispatch to both union signatory employers and non-union employers who agree to abide by the program's standards, rules, regulations and policies.

Continued

- Work processes are consistent with program's approved apprenticeship standards and are being properly recorded.
- Job site review found that the apprentices interviewed are completing the Apprentice Quarterly Work and Training Record. All stated that they turned it in to the program when they attend school or when it was completed.
- Apprentice files examined contained copies of school absences, evaluations, progress reports and final test scores.
- The program has completed and submitted the annually required Self-Assessment Review and Program Improvement Plan to DAS in a timely manner.
- The program committee meeting minutes include formalized motions to approve indentures, upgrades, prior credit, cancellations, completions, evaluations and discipline of apprentices.

The apprenticeship program provides a training program for the following occupation:

DOT Code: 801.361.014

<u>Name of occupation</u>	<u>Term of occupation</u>	<u>Number of apprentices</u>
Field Structural Ironworker	48 months	667

The Related and Supplemental Instruction is provided by the program's training center which is located at the same site as the program operations. Each apprentice enrolled receives an orientation packet that includes the rules and regulations, an explanation of the program's standards, an Apprentice Quarterly Work and Training Record (program's version of DAS Form 103) and a class schedule.

The program's Local Education Agency (LEA) is Cerritos Community College located at 11110 Alondra Boulevard, Norwalk CA 90650. Graciela Vasquez is the LEA representative for the program.

SCOPE AND FOCUS

The principal objectives of the audit are to ensure the program is complying with their standards, that all on-the-job training is performed by a journeyman, that all related and supplemental instruction required by the apprenticeship standards is being provided, that all work processes in the apprenticeship standards are being covered, and that graduates have completed the apprenticeship program's requirements.

The audit focused on reviewing records and activities that tend to support and substantiate the program's efforts, practices, systems and capabilities to provide and deliver the on-the-job training and related instruction. The program's policies and procedures were reviewed to determine if they support the program's approved standards.

METHODOLOGY

After completing an initial review of the program's standards and records on file with the DAS, an audit plan was established with the following steps:

1. Notified the program 14 days in advance of our intent to audit.
2. Prepare an entrance interview
3. Organization of all working papers to conduct the interview
4. Confirm the location where records are maintained
5. Conduct a random review of apprentice files
6. Set the time and date of the meeting
7. Schedule inspection of the training facility and job sites
8. Request and review copies of the committee meeting minutes for the last 12 months.

All steps listed above were accomplished and include interviews with primary staff, apprentices and job site supervisors.

AUDIT RESULTS

1. STANDARDS

The objective is to determine whether the programs are submitting periodic revisions to their standards and if standards are reasonably current. "Standards" are a written document containing all terms and conditions for the qualification, recruitment, selection, employment and training, working conditions, wages, employee benefits and other compensation for apprentices. It may also include other provisions and statements. All apprenticeship programs are required to submit their apprenticeship standards to the DAS Chief for approval. The California Code of Regulations states the program must submit revisions to its standards when necessary.

(a) Findings

- (1) Our audit review found that DAS approved program's complete revision of its standards on May 24, 2005.
- (2) Program is submitting Revision of Approved Standards in a timely manner for DAS approval.

(b) Recommendations

- (1) Continue to review and update standards as needed or whenever any changes are made to the apprenticeship program and report this information to the DAS Apprenticeship Consultant.

Article IV (5) of the program's standards, Section 205 (f), 212 (a)(6) (7), (c)(2) (11) of the California Code of Regulations states that the program sponsor must submit revisions to its standards when necessary.

2. RULES AND REGULATIONS

The objective is to determine if the programs have adequate rules and regulations, are implementing them as required, and provide a copy to the apprentices. The rules and regulations can be defined as an orientation or workshop session that explains the apprenticeship program standards and the operation of the apprenticeship program. It includes information on what is expected by both the program and the apprentice.

The rules and regulations for this program were adopted and contain a policy statement showing responsibilities of the apprentice and the committee. Apprentices are cited for failure to follow the rules and regulations. A letter of citation is mailed to the apprentice to appear before the committee and failure to appear is reason to recommend cancellation from the program for failure to comply with a committee directive. Additionally, the rules and regulations state that each apprentice will be notified in writing of the date(s) that she/he is to attend RSI classroom training.

Applicants must be at least 18 years of age and must be able to physically perform the work of the craft. A drug test is required prior to indenture.

When the apprentice is approved by the program to enter the training he/she is given a copy of the rules and regulations and scheduled for eight Saturdays of orientation classes. Failure to attend all class meetings will result in a work suspension or termination from the program. The apprentice must sign the document indicating they have received, read and understood the rules and regulations.

(a) Findings

- (1) This review found that the apprentice files contained signed copies/receipts to acknowledge the apprentice received, read, and understood the rules and regulations.
- (2) The rules and regulations are reviewed by the Committee and updated when needed. The Committee applies the rules and regulations in a fair and consistent manner. Actions taken by the Committee are reflected in the meeting minutes and apprenticeship files.

(b) Recommendations

- (1) Continue enforcing rules and regulations in a fair and consistent manner.

Article VI (2) of the program's standards, Section 3071, 3073, and Section 212 (a) (6) (7), (c) (2) (3) (8), (14) of the California Code of Regulations states that the program must establish rules and regulations that govern the program.

3. ACTIVE APPRENTICES AND CANCELLATIONS

The review of this item is to determine if the program is monitoring apprentices as they enter and proceed through the program. It is also to determine if the program is maintaining accurate records on both the active and cancelled apprentices. The program should have the ability to provide evidence of procedures used for periodic reviews and evaluation of the apprentice's progress in job performance and related instruction and maintenance of appropriate progress records. In addition, the program should have a process in place to notify the DAS when an apprentice leaves the program.

(a) Findings

- (1) The program's numbers of registered indentured apprentices (667) were correct and consistent with the number of apprentices registered with the DAS.

(b) Recommendations

- (1) Continue to keep the DAS informed of indentures, cancellations and completions in a timely manner. All changes affecting the status of the apprentices in the program must be submitted to the DAS.

Section 205 (a)(1)(2) (i), 212 (a)(6) (7)(8), (b)(9), (c)(2)(10) 224 of the California Code of Regulations states that the program sponsor must maintain accurate apprenticeship records and submit changes, updates and revisions of an apprentice's status when necessary.

4. ON -THE JOB TRAINING (OJT) PROGRESS RECORDS, ADVANCEMENTS AND EVALUATIONS

Our review is to determine if apprentices are progressing on schedule, that the program is maintaining adequate OJT records, receiving periodic evaluations and if the program has adequate records and a system in place to ensure that apprentices are covering all the work processes.

The program uses the following items to track apprentices' schedules: OJT records, periodic evaluations and satisfactory completion of RSI classes. Apprentices are advanced twice a year, March and September, upon successful completion of RSI and OJT hours within the specific time frame.

- Satisfactory completion of required RSI classroom hours. Standards state, apprentices shall satisfactorily complete prescribed courses of RSI, which will be no less than 160 per year. Program requires 184 RSI hours the first year and 160 per year for the following three years for a total of 664 hours .
- Accumulation of 600 OJT hours from an approved contractor and satisfactory progress/evaluation report from the contractor.
- Satisfactory passing (60% or higher) on each unit exam, in conjunction with satisfactory progress/evaluation reports from instructor.

Program provides the apprentice with a Quarterly Work and Training Record (program's version of DAS Form 103) to document and record OJT hours and work processes. The work and training record contains a daily and monthly log to record hours worked in the various work processes. The work and training record has a place for the supervisor's signature and a list of the various work processes. The apprentice is required to turn-in his work and training report every quarter or when reporting to school. If apprentice is current with RSI hours and has the required OJT hours he/she is advanced to the next level of training and receives a wage increase.

Audit files reviewed had the apprentice quarterly work and training reports signed by a supervisor/foreman. Reviewed files contained total OJT hours worked by the apprentice tallied by the various work processes, completed RSI classes, test scores, attendance records, and evaluation and progress reports.

(a) Findings

- (1) The program is utilizing the quarterly work and training report for tracking, documenting and tallying the various work processes.
- (2) The quarterly work and training report is tallied by the apprentice and is signed by a supervisor and/or foreman.

(b) Recommendations

- (1) Continue utilizing the quarterly work and training report for tracking, documenting, and tallying apprentice work processes.

- (2) Continue having all forms verifying work processes signed by the apprentice and the supervisor/forman.
- (3) Continue to keep complete and signed quarterly work and training reports in each apprentice file along with a total of the various work processes.

Section XVII of the program's standards, and Section 3073.1, 3076, 3078(e) of the Labor Code, and Sections 208, 210, 212(a) (4) (5) (7) (8), (b) (9), (c) (2) (6) (8) (9) (16) (18), of the California Code of Regulations. The program must offer training and supervision in all the work processes defined in its standards and has a system to ensure that apprentices cover all the work processes. The program must have a system of documenting and maintaining records that will assist in the review and evaluation of each apprentice's progress in job performance. The program must have a procedure for recording and maintaining accurate records, and a procedure for periodic review and evaluation of progress.

5. RELATED AND SUPPLEMENTAL INSTRUCTION (RSI)

The objective of our examination was to determine if apprentices are progressing on schedule, attending classes, covering the entire course of study, and to ensure the programs are maintaining accurate records with adequate systems in place to provide training.

The program's Related and Supplemental Instruction is approved by a Local Education Agency (LEA). The LEA is Cerritos Community College located at 11110 Alondra Boulevard, Norwalk CA 90650. Graciela Vasquez is the LEA representative for the program.

The course outlines as written by the program have been reviewed and approved by the LEA.

The apprentices are required to attend assigned classes immediately upon being indentured in the program. Classes begin with eight Saturdays of Orientation as an introduction to the trade (64) hours. The apprentice is then scheduled to complete 15 (40 hour) core classes over the course of their apprenticeship. The classes are offered under a semester system and, after completion of the Saturday classes, the classes are structured in a Monday-Friday format. The apprentices are not compensated for RSI, but can apply for unemployment benefits.

An apprentice that fails to attend the first assigned class meeting of each semester will be removed from the sign-in roster and cited to appear before the JATC at their next regularly scheduled meeting. Each apprentice will be required to attend each assigned class for the full class session. After a single absence, the apprentice will be notified that he/she missed class hours in excess of those required to fulfill class requirements, and will be referred to the JATC. Upon review by the JATC the apprentice will either:

- Receive a one day job suspension and directed to appear for a make-up class date.
- Reassigned to the same classes in the next semester.
- Cancelled from the Apprenticeship Program.

Three tardies (arrival up to fifteen minutes after the class begins) shall be equivalent to one absence. Each additional tardy shall be equivalent to one absence. Apprentices arriving over fifteen minutes late will be considered absent

from the class. Leaving class prior to dismissal shall be equivalent to one absence. Upon missing the second class meeting the apprentice will be cited to appear before the JATC at which time appropriate action will be taken. School authorities, who include the Instructors, may suspend an apprentice from class and/or school. At which time a referral will be submitted to the JATC for appropriate action for the apprentices who violate school rules and/or the authority of the instructor.

Every apprentice must bring tools and study materials to class before signing in on the "class sign-in sheet". The rules and regulations state that the apprentice shall first request permission, in writing, from the Committee/Coordinator to be excused from attending classes, indicating the documented reason for such a request.

(a) Findings

- (1) The records of attendance, test scores, progress evaluations, and classroom hours for the apprentices are recorded on the program's computer data base. A record of this information is also kept in the apprentice file.
- (2) The apprentice files examined contain a consistent record of all absences related to school attendance, test scores, copies of advancement letters to employer and apprentice, and any disciplinary actions.

(b) Recommendation

- (1) Coordinator and instructors should continue to provide updates to the program and the apprentices on how they are progressing in their required educational courses. Review curriculum and develop new courses to cover additional needs when needed.

Section XVI of the program's standards, Section 3073.2, 3078(d), of the California Labor Code, and Section 205(e)(h), 212(a)(3)(6)(7) (c)(13)(14) of the California Code of Regulations states that it is recommended that the program provide a minimum of 144 hours per year of supplemental instruction for each year of apprenticeship and adequate arrangements for related and supplemental instruction, and have the ability and commitment to train apprentices with current industry standard criteria.

6. TRAINING CENTER

The objective is to ensure the program has adequate facilities, tools, materials and equipment to train apprentices, and to determine if the facilities are utilized and adequate for training.

The program employs 3 full time instructors, and all full time instructors have teaching credentials. During the visit, classes were in session and the auditor was able to observe a classroom session. The instructors conduct classes on a weekly schedule at the training center. The auditor toured the La Palma training facility. The training center is located at the same location as the program. The training center is a 29,500 square foot building that sits on 2.77 acres. It consists of five classrooms and one shop lab utilized for demonstrations and "hands-on" working projects. The instruction is done with good health and safety practices in mind.

(a) Findings

- (1) Our inspection of the training facility found it to be sufficient to train apprentices.

(b) Recommendation

- (1) The program should continue current practices and insure plans for growth are based upon the current successful model.

Section 3074 of the California Labor Code—Section 212(a) (3) (4) (8), (c) (13) (12), 212.3 of the California Code of Regulations states that the program sponsor must have adequate arrangements for related and supplemental instruction.

7. MECHANISM TO KEEP APPRENTICES REASONABLY EMPLOYED

Our objective is to determine if apprentices are kept reasonably employed, to ensure the program has adequate systems in place to rotate apprentices so they cover all work processes, and to provide apprentices with continuing employment in the event of a layoff.

The review found the program has an established system to keep apprentices reasonably employed and to provide them with continuing employment in the event of a layoff. If an apprentice becomes unemployed they should immediately register on the out-of-work list at their local union. In addition apprentices are given a list of employers and are encouraged to solicit employment with an employer within any of the twelve counties covered by these Standards.

Unemployed apprentices attending RSI classroom training may be eligible for unemployment insurance benefits. Unemployment insurance telephone numbers are given to those apprentices meeting EDD criteria.

(a) Findings

- (1) The review found the program has an established system to keep apprentices reasonably employed and to provide them with continuing employment in the event of a layoff.
- (2) The records found the referral/dispatch system keeps the apprentices employed within their industry. They are also referred to other employers, giving the apprentices an opportunity to train in all work processes.

(b) Recommendation

- (1) The program should continue the system they have in place and encourage additional employer involvement.
- (2) The program should continue to refer apprentices to other employers and encourage the apprentices to acquire OJT hours in all required work processes.

Section 3080 of the Labor Code, and Section 212 (b) (7) (9), (c) (16) (18) of the California Code of Regulations. The program(s) must have a mechanism to keep apprentices reasonably employed and

8. JOB SITE VISIT

A review of the job site offers an opportunity to view a job in progress, observe the work that is being done, and allows us to discuss the operation of the program with the apprentice. It enables direct contact with the apprentice to determine the following:

- If the apprentice is performing the various tasks listed within the work processes of their trade.
- If advancements are made on schedule.
- If the apprentice is receiving the correct pay and benefits.
- If the apprentice is kept employed on a reasonably continuous basis.
- If the program's mechanism to keep apprentices reasonably employed is adequate.

The program suggested five job site locations to visit. Telephone calls were made to arrange a review of the job sites and contact was made with two locations.

The auditor visited a job site located in San Pedro California called the L.A. Port Police Station and found three apprentices working under the supervision and direction of journeymen and employed at tasks defined within the work processes of the program standards.

The auditor also visited the Marbroll High School job site located in Hancock Park, California and found four apprentices working under the supervision and direction of journeymen and employed at tasks defined within the work processes of the program standards.

Interviews were conducted with all of the apprentices. The auditor found that the apprentices had the equipment, materials and tools of the trade sufficient to train apprentices. Each apprentice receives proper pay and benefits and attends OJT classroom training. The interviews confirmed apprentices are advanced on schedule. The apprentices interviewed stated that they write in the total hours of OJT training on their apprentice work and training record broken into the various work processes. The apprentices verified that the work and training record sheet is signed by the job site supervisor. All apprentices interviewed stated they had to turn in the work and training record sheet to the program every quarter or when they attended school.

The interview with the supervisors confirmed there is a proper ratio of journeyman to apprentice and adequate supervision. All the apprentices interviewed stated they were very satisfied with the program and all confirmed that they were being properly trained. Apprentices also stated that they were very pleased with the program's class instructors and that whenever they had a problem understanding the course work the instructors would work with them individually until they understood.

(a) Findings

- (1) Supervisor/foreman are signing and verifying the work processes on the work and training record sheets.
- (2) The auditor found that the apprentices were filling out the work and training record sheet and submitting it to the program on a quarterly basis.

(c) Recommendations

- (1) Program should continue to stress the importance of having the foreman/supervisor sign the work and training records sheets thereby verifying the work processes
- (2) The program should continue to ensure apprentices are correctly recording work process and OJT hours and are tracking hours within the individual work processes.
- (3) The program should continue to ensure each apprentice turns in their record sheet to the program quarterly and continue to keep a complete and signed record sheet in each apprentice file.

Section 208, 212(a) (1) (2) (4), (b) (4) (5) (6), (c) (6) (13) (14) of the California Code of Regulations states that all on-the-job training will be performed by journeymen, that all related and supplemental instruction required by the apprenticeship standards will be provided, that all work processes in the apprenticeship standards are being covered, and that graduates have completed the apprenticeship program's requirements.

9. SELF-ASSESSMENT REVIEW AND PROGRAM IMPROVEMENT PLAN

The objective is to determine if the program has submitted the annual Self-Assessment Review and Program Improvement Plan. The California Code of Regulations Title 8, Section 212.3 requires programs to perform an annual self-evaluation and to create an improvement plan. The DAS now requires that each program submit a copy of their Annual Self-Assessment Review and Program Improvement Plan to their apprenticeship consultant by December 1 of each year.

(a) Findings

- (1) The required annual Self-Assessment Review and Program Improvement Plan for 2009 was submitted on December 16, 2008.

(b) Recommendations

- (1) Continue to submit the Self-Assessment Review and Program Improvement Plan in a timely manner.
- (2) Use the Self-Assessment and Program Improvement Plan as a tool for setting goals for your program and adapt the listed changes during the next 12 month period.

Section 212 (a) (6) (7), (c) (2) (11), 212.3 of the California Code of Regulations states that the program sponsor must submit annually a Self-Assessment Review and Program Improvement Plan to the DAS.

10.COMMITTEE MEETINGS AND MINUTES OF MEETING

Joint apprenticeship committees have equal representation from labor and from management. Each committee also includes a consultant representing the Division of Apprenticeship Standards or the Bureau of Apprenticeship and Training, U.S. Department of Labor. There is also an advisor from the local public school district, and such other advisors and the apprenticeship consultant act without vote. This committee is responsible for administering the Standards for this program. In carrying out its functions, the committee has certain authority under the law. The actions, therefore, must be in accordance with approved apprenticeship standards and should be recorded in the minutes.

The objective is to determine if the apprenticeship committee is meeting on a regular basis, documenting actions, discussing and reviewing apprenticeship records, and making appropriate assessments and evaluations.

The committee provided the program committee meeting minutes for the past year. The committee meetings are held monthly. The meetings are conducted in the La Palma office. An advance notice is sent out to all members and any guests of the committee.

(a) Findings

- (1) The program committee is a Labor/Management Co-Operative and has four labor representatives and four management representatives. The committee also includes one advisor apprenticeship coordinator and one advisor local education agency representative. All advisors act without vote. All disciplinary actions are reviewed by the committee.
- (2) Our review of the committee minutes for the last 12 months showed that the committee had a record of disciplinary actions. The committee minutes were sufficient in form and content.

(b) Recommendations

- (1) Continue to hold regular meetings and keep accurate committee minutes and records.
- (2) Continue to ensure DAS apprenticeship consultant is advised of committee meetings well in advance and the consultant will endeavor to participate in meetings when possible.

Section 3076, 3080(b), 3078(d)(f), 3079, 3093(k), of the California Labor Code, and Section 213, 218, 212(7), 208(5), 205(e)(f)(g)(i), 212(c)(1)(6) (9), 224 of the California Code of Regulations states that the program sponsor must maintain adequate documentation and records.

COMMENTS FROM PROGRAM SPONSOR

Comments, if submitted by the program sponsor during the 14-day review and comment period, will be included with this report to the Chief of DAS and ultimately to the California Apprenticeship Council.

CORRECTIONS AND TIMELINE

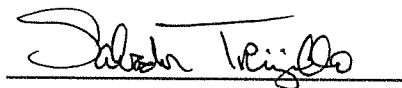
The audit findings and recommendations are set forth in this report. The program has 14 days from the receipt of this report to review and submit comments on the report. Within 10 days following the receipt of comments or the completion of the comment period, a final report will be submitted by the Chief of DAS to the California Apprenticeship Council.

The final report will detail the findings with recommendations for remedial actions. The program must remedy all deficiencies and be in full compliance with its apprenticeship standards. The program must notify the DAS in writing when deficiencies have been remedied. A DAS representative will schedule an appointment to review the completion of the remedial actions. Failure to comply may be grounds for withdrawing state approval of the apprenticeship program.

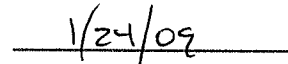
11. REMARKS

The results of this audit do not modify, replace or negate other duties and requirements or any previous notices you may have received regarding the fulfilling of your obligations prior to or after the audit period. In addition, law changes or new rulings might result in different findings in future audits.

Respectfully submitted by,



Salvador Trujillo
Apprenticeship Consultant, Auditor
DAS, Los Angeles District Office



Date

FIELD IRONWORKERS APPRENTICESHIP & TRAINING PROGRAM

California-Nevada-Arizona

5555 Fresca Drive – La Palma, CA 90623 – (714) 228-9744 – Fax (714) 228-9750

Paul E. Martinez

Coordinator

February 23, 2009

Sal Trujillo,

We have received and reviewed the completed audit on January of 2009. We are satisfied with the results given. We will continue to conduct the Program with the suggestions given. Thank you for your time and comments.

Sincerely,

Paul E. Martinez

Paul E. Martinez
Apprenticeship Coordinator